

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

ISRAEL RODRIGUEZ, RAY RODRIGUEZ, §  
and JOEL RODRIGUEZ §

VS. §

§ Civil Action No. 2:21-cv-180

JOHNSON BROS. CORPORATION, §  
SOUTHLAND HOLDINGS, LLC, and §  
HERITAGE MATERIALS, LLC §

**COMPLAINT**

Israel Rodriguez, Ray Rodriguez, and Joel Rodriguez, plaintiffs herein, alleges:

1. This case is filed under 42 U.S.C. § 2000d.

**VENUE AND JURISDICTION**

2. The Court has jurisdiction of this action pursuant to 42 U.S.C. § 2000e-5(f)(3).
3. Venue is proper in this court under 42 U.S.C. § 2000e-5(f)(3), because the unlawful employment practice was committed in this district.

**PARTIES**

4. Defendant Johnson Bros. Corporation may be served by and through its registered agent for service of process, the Texas Secretary of State, to forward to 5476 Lithia Pinecrest Rd., Lithia, FL 33547.
5. Defendant Southland Holdings, LLC may be served by and through its registered agent for service of process, Southland Contracting, Inc., 608 Henrietta Creek Rd., Roanoke, TX 76262.
6. Defendant Heritage Materials, LLC may be served by and through its registered agent for service of process, Southland Holdings, LLC, 608 Henrietta Creek Rd., Roanoke, TX 76262.

### **FACTS**

7. Plaintiffs Israel Rodriguez, Ray Rodriguez, and Joel Rodriguez were employed by the Defendants, Johnson Bros. Corporation, Southland Holdings, LLC, and Heritage Materials, LLC.
8. Plaintiffs are Hispanic.
9. The Defendants terminated Plaintiffs on 09/19/2019 because of their national origin.
10. Each Plaintiff filed a charge of discrimination with the EEOC on 01/06/2020.
11. The EEOC issued right-to-sue letters to the Plaintiffs within ninety days of the filing of this complaint.

### **LAW**

#### **COUNT ONE:**

12. It is an unlawful employment practice for an employer to discharge an individual because of his national origin. 42 U.S. Code § 2000e-2(a).
13. There is a private right of action for the person aggrieved 42 U.S.C. § 2000e-5(f)(1).

### **DAMAGES**

14. Plaintiffs may recover compensatory and punitive damages. 42 U.S. Code § 1981a.
15. Compensatory damages include lost wages, emotional distress, and mental anguish.
16. Attorney's fees may be awarded to the prevailing party. 42 U.S.C. § 2000e-5(k).

### **JURY DEMAND**

17. Plaintiff hereby demands a jury trial in this case.

### **EXHAUSTION OF ADMINISTRATIVE REMEDIES**

18. The plaintiff has exhausted all administrative remedies before the filing of this suit.

### **PRAYER**

19. For these reasons, Plaintiff asks for judgment against Defendant for the following:

- A. Actual damages, including past and future: mental anguish; physical disfigurement; loss of enjoyment of life; lost wages; and loss of earning capacity.
- B. Pre-judgment and post-judgment interest.
- C. Costs of suit.
- D. All other relief the Court deems appropriate.

Dated: May 25, 2021

Respectfully submitted,

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